

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

AYA HEALTHCARE, INC.,

Plaintiff,

v.

RALPH DE LA TORRE and MEDICAL
PROPERTIES TRUST, INC.,

Defendants.

Case No. 3:24-cv-00390-B

JOINT STATUS REPORT IN RESPONSE TO ECF NO. 34

On May 28, 2024, the parties to the above captioned action filed their Stipulation to Stay Action in Its Entirety (ECF No. 33), requesting that this case be stayed as a result of Steward Health Care Systems, LLC and certain of its affiliates filing for Chapter 11 bankruptcy. *See In re: Steward Health Care System, LLC, et al.*, Case No. 24-90213 (Bankr. S.D. Tex.) (the “Steward Bankruptcy”).

The Court, at ECF No. 34, stayed this action and further ordered the parties to submit a status report every 60 days. Accordingly, the parties hereby jointly submit this Third Joint Status Report in Response to ECF No. 34.

The Steward Bankruptcy is still pending and has not concluded. The stay has not been lifted. The parties will submit another status report in 60-days per the Court’s order.

Defendant Medical Properties Trust, Inc. (“MPT”) contends that all claims asserted against MPT in this action were released pursuant to a global settlement agreement entered in the Steward Bankruptcy (the “Bankruptcy Settlement”), which was approved by the Bankruptcy Court on September 18, 2024 and took effect no later than November 20, 2024. Counsel for the Plaintiff is in the process of reviewing the Bankruptcy Settlement and related documentation. The parties agree that the stay of this action shall not preclude any party (whether consensually or on a contested

basis) from dismissing or seeking dismissal of the Complaint based on the Bankruptcy Settlement or taking any other action in this Court related to the Bankruptcy Settlement.

[Signature pages follow]

Dated: December 2, 2024

/s/ Peter A. Moir

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CERTIFICATE OF SERVICE

I certify that on December 2, 2024, the foregoing was filed and served using the Court's ECF system.

/s/ Peter A. Moir
Peter A. Moir